REMARKS

Claims 6-30 are pending in the instant application. Claims 6-20 presently stand rejected. Claims 6 and 14 are amended herein. Claims 21-30 are newly presented. Entry of this amendment and reconsideration of the pending claims are respectfully requested.

Claim Rejections – 35 U.S.C. § 103

Claims 1-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,324,608 B1 to Papa et al. (hereinafter "Papa") in view of U.S. Patent No. 6,529,978 B1 to Eide et al. (hereinafter "Eide").

"To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. All words in a claim must be considered in judging the patentability of that claim against the prior art." M.P.E.P. § 2143.03.

Independent Claims 6 & 14

Independent claim 6 recites, in pertinent part, "the communication link using **packetized messages based on a network transmission protocol** to provide communication **between** the first **processor** and the first **peripheral device**." Applicants strenuously submit that the cited prior art fails to disclose communicating between a peripheral device and a processor, both disposed within a housing, using packetized messages based on a network transmission protocol.

The Examiner acknowledges that Papa fails to disclose using packetized messages to communicate between a processor and a peripheral device. However, the Examiner cites Eide as teaching this element and relies on the portion of Eide which states,

> an interface to a network 22 may be provided, e.g., to provide communications capability using any number of network protocols (e.g., IPX, TCP/IP, SNA, etc.)."

Eide, col. 5, lines 10-14. However, this portion of Eide does not state that processor 12 communicates with I/O interface 16 using packetized messages. In fact, Eide clearly states that

> **External communication** with apparatus 10 is handled through an input/output (I/O) interface 16 coupled to processing complex 11.

Eide, col. 4, lines 34-35 (Emphasis added). Thus, I/O interface 16 communicates with external network 22 using packets, but Eide does not disclose I/O interface 16 communicating with processor 12 using packets, as the claims recite. Furthermore, Eide clearly illustrates and describes slot 1 of I/O interface 16 coupled to processing complex 11 via system I/O **bus** 18 (see FIG. 1 of Eide). Buses do not communicate with packetized messages. Rather, system buses use address buses to designate destinations within a computer system for data communicated on a data bus. A system bus does not use headers, as packetized messages do, to designate a destination for data transmitted across the system bus. Packets simply have no meaning to a system bus. Applicants strongly urge that system I/O bus 18 illustrated in FIG. 1 of Eide does not teach or suggest a communication link using **packetized messages based on a network transmission protocol** to communicate between I/O interface 16 and processor 12.

Consequently, the combination of Papa and Eide fails to teach or suggest all elements of claim 6, as required under M.P.E.P. § 2143.03. Independent claim 14 also recites similar nonobvious language as independent claim 6. Accordingly, Applicants request that the instant §103(a) rejections of claims 6 and 14 be withdrawn.

Independent Claim 14

Independent claim 14 is nonobvious over the prior art of record for yet another independent reason. Claim 14 recites, in pertinent part, "creating a **network software socket** for each of the processor and the peripheral device." The Examiner cites col. 4, line 66 – col. 6, line 65 of Papa as disclosing creating a network socket. *Office Action* mailed September 14, 2004, page 7, lines 4-5. However, Papa fails to even mention software sockets. The portion of Papa cited by the Examiner discloses a CPU module 103 and network interface modules 104 which are removably mounted on chassis 170 (see FIG. 1 of Papa). However, removable hardware modules simply do not disclose,

teach, or fairly suggest creating a network software socket for each of a processor and a peripheral device.

Dependent Claims

Dependent claims 7-13 and 15-20 are nonobvious over the prior art of record for at least the same reasons as discussed above in connection with their respective independent claims, in addition to adding further limitations of their own. Accordingly, Applicants respectfully request that the instant § 103 rejections for claims 7-13 and 15-20 be withdrawn.

New Claims

Applicants respectfully submit that new claims 21-30 are nonobvious over the cited prior art. Independent claim 21 includes similar nonobvious elements as independent claim 6. Furthermore, dependent claim 28 recites "wherein the peripheral device comprises an **external network interface** to couple to an external network external to the housing" while dependent claim 29 recites that the external network interface includes a network address translation ("NAT") device to translate network addresses between the external network and the network communication link internal to the housing. Clearly, the cited prior art fails to disclose these elements.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants believe the applicable rejections have been overcome and all claims remaining in the application are presently in condition for allowance. Accordingly, favorable consideration and a Notice of Allowance are earnestly solicited. The Examiner is invited to telephone the undersigned representative at (206) 292-8600 if the Examiner believes that an interview might be useful for any reason.

CHARGE DEPOSIT ACCOUNT

It is not believed that extensions of time are required beyond those that may otherwise be provided for in documents accompanying this paper. However, if additional extensions of time are necessary to prevent abandonment of this application, then such extensions of time are hereby petitioned under 37 C.F.R. § 1.136(a). Any fees required therefore are hereby authorized to be charged to Deposit Account No. 02-2666. Please credit any overpayment to the same deposit account.

Respectfully submitted,

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Date: _Oct. 20, 2004_

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